## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

EDDIE F. INGRAM,  Plaintiff	)	
vs.	)	Civil Action No. 3:17-cv-352-DPJ-FKB
GSI SERVICES, LLC d/b/a EMERALD TRANSFORMER, Defendant	) ) )	

## UNOPPOSED MOTION FOR ENTRY OF PROTECTIVE ORDERS

The Defendant, GSI Services, LLC, files this Unopposed Motion for Entry of Protective Orders, and would show in support the following:

- 1. To protect certain confidential information and to facilitate the discovery process, the Plaintiff and Defendant request entry of a protective order. The parties have consulted and agreed to such an order substantially in the form of the document attached as **Exhibit "A."** The general protective order, attached as **Exhibit "A"**, governs the exchange of information during the pretrial phase. In the event the either of the parties wishes to use any confidential information at trial, a separate order will be prepared and presented at the pretrial conference.
- 2. The Plaintiff wishes to take the deposition of a nonparty fact witness, Jeff Coleman. Mr. Coleman wishes to testify under the protection of a court order. Counsel for both parties and counsel for Mr. Coleman have consulted and agreed upon entry of a second, specific protective order to facilitate the testimony of Mr. Coleman. That protective order is attached as **Exhibit "B"** to this Motion.
- 3. The Defendant has consulted with counsel for the Plaintiff and counsel for the nonparty deponent, and all have agreed upon entry of the protective orders.

4. Due to the straightforward nature of this Motion, the Defendant requests a waiver of requiring a separate memorandum of authorities under L.U. Civ. R. 7(b)(4).

Based on these facts, the Defendant, GSI Services, LLC, respectfully requests that the Court enter protective orders substantially in the form of the documents attached to this Motion as **Exhibits "A"** and **"B."** The Defendant requests any other relief to which it is entitled, at law or in equity.

Dated: April 18, 2018.

Respectfully submitted,
GSI SERVICES LLC d/b/a EMERALD
TRANSFORMER

By: s/H. Richard Davis, Jr.

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## **CERTIFICATE OF SERVICE**

I, H. Richard Davis, one of the attorneys for the Defendant, do hereby certify that I have, this day, filed the foregoing with the Clerk of Court via the CM/ECF system, which has caused a true and correct copy to be served on all counsel of record. I have also served a true and correct copy by electronic mail on the following nonparty:

Jeff Coleman c/o Charles J. Swayze, Jr. Whittington, Brock & Swayze, P.A. 308 Fulton Street Greenwood, Mississippi 38930 cjs@whittingtonlaw.com

Dated: April 18, 2018.

s/ H. Richard Davis, Jr.
H. Richard Davis, Jr.